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SUPERIOR COURT OF THE STATE OF CALIFORNIA,  
COUNTY OF SONOMA, and SHELLY AVERILL

**UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ARLENE JUNIOR,

Plaintiff,

vs.

SUPERIOR COURT OF THE STATE OF  
CALIFORNIA, COUNTY OF SONOMA,  
and SHELLY AVERILL,

Defendants.

) Case No. 22-CV-07270-WHO

) **STIPULATED REQUEST FOR**  
) **ORDER EXTENDING DISCOVERY**  
) **DEADLINE AND (PROPOSED)**  
) **ORDER**

) Hon. William H. Orrick

) Action Filed: November 17, 2022

) Trial Date: August 12, 2024

Pursuant to Local Rules 6-1 and 6-2, the parties through undersigned counsel hereby stipulate and respectfully request that the Court extend the deadline to complete fact and expert discovery in this case by 30 days, to March 14, 2024.

1 The parties stipulate as follows:

2 WHEREAS, On February 21, 2023, the parties appeared before this Court for a  
3 Case Management Conference (ECF No. 15);

4 WHEREAS, during the Case Management Conference, and upon stipulation of  
5 the parties, this Court set the date upon which fact discovery would close as December  
6 15, 2023;

7 WHEREAS, the parties participated in a mediation on November 30, 2023,  
8 which was unsuccessful;

9 WHEREAS, this Court previously granted the parties' stipulated request for a 60-  
10 day extension of the discovery deadline to February 13, 2024 (ECF No. 22);

11 WHEREAS, despite diligent efforts, the parties are unable to complete discovery  
12 in this case by February 13, 2024;

13 WHEREAS, the parties believe that they require a 30-day extension of the  
14 discovery deadline, until March 14, 2024, to complete fact and expert discovery,  
15 including the deadline to file motions related to fact discovery;

16 WHEREAS, the proposed extension would not affect the other dates fixed by this  
17 Court;

18 WHEREAS, good cause exists to modify the Scheduling Order to extend the  
19 deadline for fact and expert discovery to March 14, 2024.

20  
21 **IT IS SO STIPULATED.**

22  
23 Dated: February 12, 2024


24  
25 SIEGEL, YEE, BRUNNER & MEHTA

26  
27 By: 

28 Dan Siegel

Attorneys for Plaintiff  
ARLENE JUNIOR

QUARLES & BRADY LLP

By:   
Corrie Klekowski

Attorneys for Defendants  
SUPERIOR COURT OF THE STATE OF  
CALIFORNIA, COUNTY OF SONOMA  
and SHELLY AVERILL

**[PROPOSED] ORDER**

Based on the Parties' Stipulated Request for Order Changing Time, and good cause appearing:

- The deadline for the parties to complete fact and expert discovery, including the deadline to file motions related to fact discovery, is extended to March 14, 2024.
- All other deadlines set shall remain unchanged.

**IT IS SO ORDERED.**

Dated: February \_\_\_\_, 2024

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Hon. William H. Orrick  
United States District Court Judge